



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Water Resources
Knoxville Environmental Field Office
3711 Middlebrook Pike
Knoxville, Tennessee 37921

May 11, 2016

Mr. George Coots
General Manager, Claiborne Utilities District
P.O. Box 606
New Tazewell, Tennessee 37824

RE: Compliance Evaluation Inspection
Claiborne Utilities District
NPDES Permit # TN0005622
Claiborne County

Dear Mr. Coots:

On April 20, 2016, Division of Water Resources personnel conducted a Compliance Evaluation Inspection regarding the filter backwash discharge at Claiborne Utilities District's water treatment plant. Claiborne Utilities District's (CUD) approval to discharge filter backwash water falls under the National Pollution Discharge Elimination System (NPDES) permit # TN0005622. The Division would like to thank you, Mr. Mike Petty, Mr. Mike Caudill, and Mr. Scott Hensley for your cooperation on the day of the inspection and for providing information on CUD's filter backwash discharge process.

Permit

A copy of the water system's 2011 to 2015 NPDES permit was on file and available for review. The permit expired in June 2015, and CUD took immediate steps to renew the permit when notified of the issue. Since the site visit, CUD has submitted their Notice of Intent renewal and is now covered under a new NPDES permit. This permit expires in 2020 and requires CUD to grab sample once a month for Total Suspended Solids, pH, Aluminum, Iron, Settable Solids and total chlorine residual during times of discharge to Ball Creek. Instantaneous flows are also required to be reported. These flows are estimated based on backwash flows as the lagoons are not metered.

Records / Reports

Division staff reviewed the operational reports maintained on-site by the water system. The records reviewed were from 2014 to March 2016 and were readily available. For this same time period, Division staff noted that CUD reported an exceedance of their Total Aluminum permit limit for February 2015. However, the actual laboratory analysis showed a level of 0.21 mg/L, which is below the established permit limit of 0.75 mg/L. Please continue maintaining copies of all test results at the water treatment plant for future reviews.

By the end of 2016, all wastewater systems that are required to submit a Discharge Monitoring Report (DMR) will begin submitting the report electronically using netDMR. CUD has consistently submitted the monthly DMRs by the 15th of the following month. Please continue to submit copies of the DMR to both the Division's central office and field office for review until access to netDMR has been obtained.

Effluent / Receiving Waters

Backwash water from CUD's water treatment plant is sent to one of two lagoons where the water is allowed to settle, before being discharged to Ball Creek. The lagoons only discharge when full.

During the on-site inspection, Division staff observed the discharge point. In addition to the backwash discharge pipe, there was a second smaller diameter pipe with a flap gate cover. Water system personnel were not sure of the origin of this secondary pipe at the time of the inspection. The Division requests that CUD investigate the secondary pipe and notify the Division of its findings. The outfall area did not show any signs of solids or unauthorized discharges.

At the time of the inspection, Division staff noted that the discharge point was not identified by a posted sign. CUD is to be commended on their quick action to have a sign meeting permit requirements posted following the on-site visit.

Sludge Handling

At the time of the on-site inspection, CUD had not removed any sludge from the drying lagoon located near the two backwash basins. During our discussion of possible disposal of the sludge, Division staff mentioned using the sludge for beneficial reuse for agriculture. In a Memorandum of Agreement between the Division of Water Resources and the Division of Solid Waste Management, water treatment plant by-product must be used for beneficial purposes on cropland or grassland in order to avoid taking it to a landfill or obtaining a permit through the Division of Solid Waste Management. A copy of the Standard Operating Procedures developed by the Division of Water Resources in 1999 regarding beneficial application of water treatment by-product is attached. Any uses of the sludge outside of land application for cropland or hauling to a landfill will need to be approved through the Division of Solid Waste Management.

Laboratory and Self-Monitoring Program

CUD conducts Total Chlorine and pH in house with all other parameters listed in the NPDES permit conducted at CUD's wastewater treatment plant or by an outside laboratory. The pH meter is typically calibrated several times each week, but the calibrations were not being documented. CUD will need to ensure that in house test procedures follow Standard Method Update requirements for laboratory processes. Information on the Standard Method Update Rule is attached, but in general, the pH meter and total chlorine colorimeter will need to be calibrated or verified each day that a backwash filter discharge sample is analyzed. These calibrations and verifications will need to be documented for future review.

Conclusion

CUD is providing adequate treatment of the filter backwash water prior to discharge and consistently meeting their permit requirement. The Division would once again like to thank CUD for their cooperation during the on-site inspection. If you have any further questions or comments regarding the Compliance Evaluation Inspection, please do not hesitate to contact me at (865) 594-5564.

Sincerely,



Erich Webber
Division of Water Resources
Knoxville Environmental Field Office

cc: Mr. Mike Petty, Chief Operator, Claiborne Utilities District



TDEC - Division of Water Resources
Knoxville Field Office

ICIS NPDES Facilities Inspection Report

Facility Data

| | | | | | |
|-------------------|-------------|--------------------|--|-----------|------|
| NPDES ID: | TN0005622 | Facility Site Name | Claiborne Utilities District - WTP | | |
| | | Address | 271 Water Works Ln, New Tazewell, TN 37825 | | |
| Permit Eff. Date: | Feb 1, 2011 | Permit Exp Date: | Jun 30, 2015 | SIC Code: | 4941 |

Compliance Monitoring Information

| | | | | | |
|-------------------------------------|--|--|--|--|--|
| Compliance Monitoring Activity Name | Compliance Evaluation (non-sampling) (CEI) | | | | |
| | * If Bio Monitoring is selected above, select the method used: | | | | |
| Compliance Monitoring Activity | Evaluation | | | | |

Compliance Monitoring Dates/Times

| | | | |
|-------------------------------------|-----------------|------------------------------------|------------------|
| Entry Date/Time (mm/dd/yyyy hh:mm): | 04/20/2016 9:30 | Exit Date/Time (mm/dd/yyyy hh:mm): | 04/20/2016 15:30 |
|-------------------------------------|-----------------|------------------------------------|------------------|

Facility Representatives

| | |
|--|---|
| Mr. Mike Petty, Chief Operator, (423) 626-5102 Mr. Mike Caudill, Operator, (423) 626-5102 Mr. Scott Hensley, Operator, (423) 626-5102 On-Site Representative(s) Title, Phone Number | Mr. George Coots, General Manager, (423) 626-4282 Responsible Official(s), Title, Phone Number |
|--|---|

Statute and Section Information

| | | | | | | |
|---|---|---------------------------------------|-------------------------------------|---|--------|---|
| Federal Statute: | CWA - Clean Water Act | State Statute: | Tennessee Water Quality Control Act | | | |
| Programs: | NPDES- Base Program (Limits, Reporting, & Schedule) | | | | | |
| Compliance Monitoring Reason: | Core Program | | | | | |
| Compliance Monitoring Agency Type: | State | Agency Name: | TDEC - DWR | | | |
| Did EPA assist/ Inspection? | No | Time Physically conducting activity: | Days: | 2 | Hours: | 0 |
| Inspection Type: | State | Compliance Monitoring Action Outcome: | Immediately Corrected | | | |
| Lead Agency: | State | Compliance Monitoring Rating Code: | Satisfactory | | | |
| If Joint Inspection, what was the purpose of the other party? | | | | | | |

Areas Evaluated During Inspection (Check only those areas evaluated)

| | | |
|---|--|--|
| <input checked="" type="checkbox"/> Permit | <input type="checkbox"/> Self - Compliance Program | <input type="checkbox"/> Pretreatment |
| <input checked="" type="checkbox"/> Records / Records | <input type="checkbox"/> Compliance Schedule | <input type="checkbox"/> Pollution Prevention |
| <input checked="" type="checkbox"/> Facility Site Review | <input checked="" type="checkbox"/> Laboratory | <input type="checkbox"/> Storm Water |
| <input checked="" type="checkbox"/> Effluent / Receiving Waters | <input type="checkbox"/> Operations & Maintenance | <input type="checkbox"/> Combined Sewer Overflow |
| <input type="checkbox"/> Flow Measurement | <input checked="" type="checkbox"/> Sludge Handling / Disposal | <input type="checkbox"/> Sanitary Sewer Overflow |

Compliance Monitoring Summary

No sign posted, but obtained the following day. Permit expired in 2015, obtained new coverage within week of notification. Need to establish Standard Method Update procedures, investigate secondary pipe at outfall area.

EPA and State Representatives

| | | |
|-----------------------|------------------------------|--------------|
| Erich Webber | TDEC / KEFO / (865) 594-5564 | May 10, 2016 |
| Inspector's Signature | Agency / Office / Phone | Date |
| Robert Ramsey | TDEC / KEFO / (865) 594-5564 | 5/10/16 |
| Manager's Signature | Agency / Office / Phone | Date |